## **MULVEY & BANANI**

## AODA STATEMENT OF COMMITMENT

Mulvey & Banani is committed to providing a barrier-free environment for all stakeholders including our clients/customers, employees, job applicants, suppliers, and any visitors who may enter our premises, access our information, or use our services.

AODA Commitment - Mulvey & Banani International Inc. will:

- 1. develop, implement and maintain policies governing how it will achieve accessibility through these requirements.
- 2. include a statement of its commitment to meeting the accessibility needs of persons with disabilities in a timely manner in its policies. These documents will be made publicly available in an accessible format, upon request.
- 3. establish, implement, maintain and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR. Accessibility plans will be made available in an accessible format, upon request, and will be posted on our website.
- 4. review and update its accessibility plan once every five (5) years and will establish, review and update our accessibility plans in consultation with persons with disabilities or an advisory committee. Annual status reports will be prepared that will report on the progress of the steps taken to implement Mulvey & Banani International Inc.'s accessibility plan. This status report will be posted on our website. If requested, the report shall be created in an accessible format.
- 5. provide training for its employees and volunteers regarding the IASR and the Ontario Human Rights Code as they pertain to individuals with disabilities. Training will also be provided to individuals who are responsible for developing the Company policies, and all other persons who provide goods, services or facilities on behalf of the Company.
- 6. provide as soon as is reasonably practicable, training on an ongoing basis to new employees and as changes to Mulvey & Banani International Inc.'s accessibility policies occur.
- 7. maintain records on the training provided, when it was provided and the number of employees that were trained.

Definitions – The definitions contained herein apply to the following regulation policies outlined in this section:

- 1. "Accessible Formats" shall include but are not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.
- 2. "Assistive devices" shall mean an auxiliary aid such as communication aids, cognition aids, personal mobility aids and medical aids (i.e. canes, crutches, wheelchairs, or hearing aids).
- 3. "Communication Supports" shall include but are not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.
- 4. "Employees" shall mean every employee who deals with clients, members of the public or other third parties on behalf of Mulvey & Banani.
- 5. "Kiosk" shall mean an interactive electronic terminal, including a point-of-sale device, for public use that allows users to access one (1) or more services or products.
- 6. "Performance Management" shall mean any activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success.
- 7. "Persons with Disabilities" shall mean those individuals who have a disability. "Disability" as defined under the Ontario Human Rights Code is:
- any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device;
- b. a condition of mental impairment or a developmental disability;
- c. a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- d. a mental disorder, or;
- e. an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.
- f. "Redeployment" The reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.
- g. "Service Animals" shall mean any animal individually trained to do work or perform tasks for the benefit of a person with a disability.
- h. "Support persons" shall mean any person whether a paid professional, volunteer, family member, or friend who accompanies a person with a disability in order to help with communications, personal care or medical needs or with access to products or services.

## INTEGRATED ACCESSIBILITY STANDARD REGULATION (IASR) POLICY – INFORMATION AND COMMUNICATIONS POLICY

Policy - This policy is intended to meet the requirements of the Integrated Accessibility Standards, Ontario Regulation 191/11 for the Information and Communications Standard set forth under the Accessibility for Ontarians with Disabilities Act, 2005. This policy applies to the provision of information and communications services and materials for people with disabilities.

General Principles – In accordance with the Integrated Accessibility Standards, Ontario Regulation 191/11, this policy addresses the following:

- Accessible Formats and Communication Supports Unless deemed unconvertible, Mulvey & Banani International Inc. will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, upon request. Accessible formats and communication supports will be provided in a timely manner and at no additional cost to the individual. The Company will take into account the person's accessibility needs when customizing individual requests and shall consult with the individual making the request to ensure suitability. The Company will make the availability of accessible formats and communication supports publicly known.
- 2. Exceptions The Information and Communications Standard does not apply to:
  - a. Products and product labels;
  - b. Unconvertible information or communications; or
  - c. Information that the organization does not control either directly or indirectly through a contractual relationship.

If it is determined, in consultation with the requesting party, that information or communications are unconvertible, the individual who made the request is provided with an explanation and a summary of the information. The Company will classify information or communications as unconvertible where:

- a. It is not technically practicable to convert; or
- b. The technology required to make the conversion is not readily available.
- 3. Review This policy will be reviewed regularly to ensure that it is reflective of the Company's current practices and legislative requirements.
- Accessible Websites and Web Content Mulvey & Banani will ensure that our website and all web content published after January 1, 2012, conform to the Web Content Accessibility Guidelines (WCAG) 2.0 in accordance with the schedule set out in the IASR.

## INTEGRATED ACCESSIBILITY STANDARD REGULATION (IASR) POLICY – EMPLOYMENT

Policy - This policy is intended to meet the requirements of the Integrated Accessibility Standards, Ontario Regulation 191/11 for the Employment Standard set forth under the Accessibility for Ontarians with Disabilities Act, 2005. This policy applies to the provision of accessible employment services for persons with disabilities.

General Principles - In accordance with the Integrated Accessibility Standards, Ontario Regulation 191/11, this policy addresses the following:

- Recruitment, Assessment and Selection. Mulvey & Banani International Inc. will notify staff and the public about the availability of accommodation for job applicants who have disabilities. Applicants will be informed that these accommodations are available, upon request, for the interview process and for other candidate selection methods. Where an accommodation is requested, the Company will consult with the applicant and provide or arrange for suitable accommodation. Successful applicants will be made aware of Mulvey & Banani's policies and supports for accommodating people with disabilities.
- Accessible Formats and Communication Supports for Employees. Mulvey & Banani International Inc. will ensure that staff are aware of our policies for employees with disabilities and any changes to these policies as they occur. Upon request, the Company will provide or arrange for the provision of accessible formats and communication supports for the following:
  - a. Information needed in order to perform their job; and
  - b. Information that is generally available to all employees in the workplace.

The Company will consult with the staff member making the request to determine the best way to provide the accessible format or communication support.

- Workplace Emergency Response Information. Where required, Mulvey & Banani International Inc. will create individual workplace emergency response information for employees with disabilities. This information will take into account the unique challenges created by the individual's disability and the physical nature of the workplace and will be created in consultation with the employee. This information will be reviewed when:
  - a. The staff member moves to a different physical location in the organization;
  - b. The staff member's overall accommodation needs or plans are reviewed; and/or
  - c. The Company reviews general emergency response policies.
- Documented Individual Accommodation Plans. During staff orientation, the new hire and the Company will complete an individual accommodation plan. This accommodation plan will include specific elements, such as:
  - a. The ways in which the employee can participate in the development of the plan;

- b. The means by which the employee is assessed on an individual basis;
- c. The ways that an employee can request an evaluation by an outside medical expert, or other experts (at the employer's expense) to determine if accommodation can be achieved, or how it can be achieved;
- d. The steps taken to protect the privacy of the employee's personal information;
- e. The frequency with which the individual accommodation plan should be reviewed or updated and how it should be done; and
- f. The means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs.
- 3. Performance Management and Career Development and Advancement. Mulvey & Banani International Inc. will consider the accessibility needs of employees with disabilities when implementing performance management processes, or when offering career development or advancement opportunities. Individual accommodation plans will be consulted, as required.
- 4. Return to Work. Mulvey & Banani International Inc. will develop and implement return to work processes for staff who are absent from work due to a disability and require disability-related accommodation(s) in order to return to work. The return to work process will outline the steps the Company will take to facilitate the employee's return to work and shall use documented individual accommodation plans (as described in section 28 of the regulation).
- 5. Redeployment. The accessibility needs of employees with disabilities will be taken into account in the event of redeployment. Individual accommodation plans will be consulted, as required.
- 6. Review. This policy will be reviewed regularly to ensure that it is reflective of Mulvey & Banani International Inc.'s current practices as well as legislative requirements.

Feedback – The ultimate goal of the Company is to meet and surpass client expectations while serving clients with disabilities. Comments on our services regarding how well those expectations are being met are welcome and appreciated. All feedback will be directed to the HR Department. Clients who have requested a response from Mulvey & Banani can expect to hear back within five (5) to ten (10) business days. Feedback from Clients regarding the way we provide goods and services to people with disabilities can be made in the following ways:

- 1. Face to face with any employee on-site
- 2. Phone: 416.751.2520
- 3. Email: connect@mbii.com
- 4. Mail: Human Resources Department 90 Sheppard Avenue East, Suite 500 Toronto, ON M2N 3A1